

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Arbitration Between:

WERNER SCHNEIDER, acting in his capacity
as insolvency administrator of WALTER BAU AG
(IN LIQUIDATION)

Petitioner,

v.

THE KINGDOM OF THAILAND

Respondent.

Civil Action No. 1:10-CV-2729 (RJH)

**DECLARATION OF ANDREW M. BEHRMAN IN FURTHER SUPPORT OF
PETITIONER'S PETITION TO CONFIRM THE ARBITRAL AWARD AND IN
OPPOSITION TO RESPONDENT'S CROSS-MOTION TO DISMISS THE PETITION**

I, Andrew M. Behrman, respectfully submit this declaration to identify relevant documents.

1. Exhibit 1 is a true and correct copy of Professor Sompong Sucharitkul's Opinion on the Protection of German Investments in Thailand, submitted to the arbitral tribunal in the underlying arbitration.
2. Exhibit 2 is a true and correct copy of Professor Sompong Sucharitkul's Supplemental Opinion, submitted to the arbitral tribunal in the underlying arbitration.
3. Exhibit 3 is a true and correct copy of the Award of the Arbitral Tribunal, dated February 6, 2008, rendered in *Desert Line Projects LLC v. The Republic of Yemen*, ICSID Case No. ARB/05/17.
4. Exhibit 4 are true and correct copies of excerpts from Day 1 of the arbitral hearing on jurisdiction, dated July 31, 2007.

5. Exhibit 5 is a true and correct copy of the Minutes of the Committee in Charge of the Approval of the CA Application of Schering Chemicals Ltd., dated October 19, 1972.
6. Exhibit 6 is a true and correct copy of the Minutes of the Committee on Investment Approval under Agreement on the Promotion and Protection of Investments, dated August 28, 2002.

Dated: September 24, 2010



Andrew M. Behrman